

knowledge or information sufficient to form a belief as to the truth of the allegations concerning the actions of plaintiff's secretary. Defendant contests the relief sought.

3. The complaint fails to state a claim upon which relief can be granted.

4. Plaintiff's claims are barred or limited by his own negligence.

5. Plaintiff's claims are barred or limited by the applicable provisions of the Uniform Commercial Code, including without limitation by the provisions of Sections 3-405, 3-406, and 4-406.

6. Plaintiff by his actions is estopped to assert any claims against defendant.

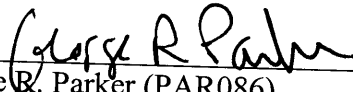
7. Plaintiff has waived any claim against defendant.

8. Plaintiff has failed to provide required notices.

9. Plaintiff's claims are barred by the statute of limitations.

COUNTERCLAIM

1. Defendant reserves the right to assert any claims that it may have against plaintiff in arbitration.


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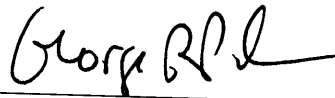
- and -

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JURY DEMAND

Reserving the right to insist upon arbitration, defendant demands a jury trial with respect to any matters that may be determined not to be subject to arbitration.



CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing Answer on E. Paul Jones, P. O. Box 448, Alexander City, AL 35011 by depositing a copy of same in the U.S. Mail properly addressed and postage prepaid on this, the 5 day of July, 2005.

